

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

In re TYSON FOODS LITIGATION

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**Consolidated Case No.
CV-05-BE-1704-E**

**JOINT MOTION TO ENTER
CONSENT DECREE AND FINAL JUDGMENT**

On November 1, 2005, this Court consolidated for discovery and pretrial purposes Equal Employment Opportunity Commission v. Tyson Foods, Inc., 05-BE-1704-S, and Henry Adams, et al. v. Tyson Foods, Inc., 05-BE-1720-S. Since that time these cases have proceeded collectively as In re Tyson Foods Litigation, Consolidated Case No. CV-05-BE-1704-E.

NOW COME THE PARTIES to these consolidated actions, the Equal Employment Opportunity Commission (“EEOC”), Henry Adams, et al. (“Individual Plaintiffs”), and Tyson Foods, Inc., by and through their representatives, and respectfully move the Court for an order:

1. Setting aside the Dismissal Order entered on October 26, 2006; and
2. Entering, in its place, the Consent Decree and Final Judgment proposed by the parties and their representatives.

In support of their motion, the Parties state the following:

1. The EEOC, the Individual Plaintiffs, and Tyson Foods, Inc., have conferred on this matter and negotiated the proposed Consent Decree and Final Judgment hereto attached.
2. The EEOC, the Individual Plaintiffs, and Tyson Foods, Inc., agree that the terms and provisions of the proposed Consent Decree and Final Judgment are acceptable to each party.
3. The EEOC, the Individual Plaintiffs, and Tyson Foods, Inc., agree that the proposed Consent Decree and Final Judgment is a fair and appropriate resolution for Civil Case No. 05-BE-1704-S and Civil Case No. 05-BE-1720-S.

Respectfully submitted,

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